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5 Attorney for Motion Picture Association, Inc.  
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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 TONIC DOMAINS CORPORATION

Case Number: 2:24-mc-00117

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15 **DECLARATION OF LARISSA  
16 KNAPP IN SUPPORT OF  
17 ISSUANCE OF SUBPOENA  
18 PURSUANT TO 17 U.S.C. § 512(h)**

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20 I, Larissa Knapp, the undersigned, declare that:  
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22 1. I am Executive Vice President and Global Chief of Content Protection  
23 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on  
24 behalf of Disney Enterprises, Inc., Sony Pictures Animation, Inc., SPE Visual  
25 Works, Inc., and Warner Bros. Entertainment, Inc. (“ACE Members”), each of  
26 which is a member of the Alliance for Creativity and Entertainment (“ACE”). ACE  
27 is a global coalition of leading content creators and on-demand entertainment  
28 services committed to supporting the legal marketplace for video content and

1 addressing the challenge of online piracy. The ACE Members, whether themselves  
 2 or through subsidiaries and affiliates, own the copyrights in the below referenced  
 3 copyrighted works.

4       2. The ACE Members (via the Motion Picture Association, Inc.) are  
 5 requesting issuance of the attached proposed subpoena that would order Tonic  
 6 Domains Corporation to disclose the identities, including names, physical addresses,  
 7 IP addresses, telephone numbers, e-mail addresses, payment information, account  
 8 updates and account histories of the users operating the following websites:

No	Infringing Website	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	megacine.to	Encanto	megacine.to/filmes/assistir-encanto-online	The Batman	megacine.to/filmes/assistir-batman-online
2	comandotorrents.to	The Batman	comandotorrents.to/batman-torrent-2022-dual-audio-dublado-4k-download-full-hd-assistir-online/	Encanto	comandotorrents.to/encanto-torrent-2021-dual-audio-dublado/
3	pelisplus.to	Encanto	pelisplus.to/película/encanto	Spider-Man: Into the Spider-Verse	pelisplus.to/película/spider-man-un-nuevo-universo
4	hianime.to	Summer Time Rendering S01E01	hianime.to/watch/summer-time-rendering-17500?ep=89776	Tokyo Pig S01E01	hianime.to/watch/tokyo-pig-6066?ep=94166

22       3. The purpose for which this subpoena is sought is to obtain the identities  
 23 of the individuals assigned to these websites who have exploited ACE Members'  
 24 exclusive rights in their copyrighted motion pictures without their authorization.  
 25 This information will only be used for the purposes of protecting the rights granted  
 26 to ACE Members, the motion picture copyright owners, under Title 17 of the United  
 27 States Code, the Copyright Act.

1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct to the best of my knowledge,  
3 information or belief.

4 Executed at Washington, D.C., on October 2, 2024.

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6 *Larissa Knapp*  
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Larissa Knapp